

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

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JOHNNY M. HUNT,

Plaintiff,

-against-

SOUTHERN BAPTIST CONVENTION,
GUIDEPOST SOLUTIONS LLC, and
EXECUTIVE COMMITTEE OF THE SOUTHERN
BAPTIST CONVENTION,

Defendants.
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Case No. 3:23-cv-00243

**RESPONSES AND OBJECTIONS OF DEFENDANT GUIDEPOST SOLUTIONS LLC
TO PLAINTIFF JOHNNY M. HUNT’S FIRST SET OF INTERROGATORIES**

Defendant Guidepost Solutions LLC (“Guidepost”), by and through its attorneys, Riley & Jacobson, PLC and Mintz & Gold LLP, hereby responds to Plaintiff Johnny M. Hunt’s First Set of Interrogatories as follows:

GENERAL RESPONSES AND OBJECTIONS

1. These responses are made solely for purposes of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and any and all other objections and/or grounds that would require exclusion of any documents or portions thereof produced herewith, all of which objections and grounds are reserved and may be interposed at the time of trial.

2. Each response is subject to all objections relating to the allowed scope of interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure.

3. These responses are based upon information presently available to Guidepost. Guidepost is continuing its discovery efforts and accordingly reserves the right at any time to

revise, correct, add to, or clarify any of the responses set forth herein, consistent with Rule 26(e) of the Federal Rules of Civil Procedure. The fact that Guidepost has answered part or all of any request is not intended and shall not be construed to be a waiver by Guidepost of all or any part of any objections to any request.

4. All responses made herein are made subject to the objections stated above and any further objection specifically stated.

5. Guidepost reserves the right to supplement its responses to these interrogatories, as necessary, up to and including trial.

RESPONSES

INTERROGATORY NO. 1. Identify each individual involved in drafting the portions of the Report that involve Johnny Hunt. For each such individual, include the person's relationship to Guidepost, the person's title, and a description of that individual's role with respect to the Report.

Response:

<u>Name</u>	<u>Title</u>	<u>Role</u>
Samantha Kilpatrick	Senior Managing Director	Lead investigator for portion of Report related to Plaintiff; drafted portion of Report related to Plaintiff
Russell Holske Jr.	Senior Managing Director	Lead investigator for portion of Report related to Plaintiff; drafted portion of Report related to Plaintiff
Krista Tongring	Senior Managing Director	Reviewed and edited portion of Report related to Plaintiff
Julie Myers Wood	Chief Executive Officer	Reviewed and edited portion of Report related to Plaintiff
Christina Bischoff	Subcontractor to Guidepost	Technical writer responsible for assembling and assisting with Report

INTERROGATORY NO. 2. Did Guidepost conduct any interviews of the Complainant, Johnny Hunt, or any other person related to the Complainant's allegations against Johnny Hunt? If so, identify the date of each such interview; the location; the identities of all persons who participated or were otherwise present for the interview; the format (i.e., in person, telephonic, by video, etc.); whether the interview was recorded; whether notes, a transcript, or any other document memorializing the contents of the interview exist; and all other documents relating to such interview.

Response: Yes

<u>Interviewee</u>	<u>Date</u>	<u>Location</u>	<u>Participants</u>	<u>Format</u>	<u>Recorded?</u>	<u>Documents</u>
Complainant's Husband	February 11, 2022		Russell Holske Jr.	Telephonic	No	Typed notes
Complainant's Husband	February 15, 2022		Russell Holske Jr.	Telephonic	No	Typed notes
Complainant	Prior to March 31, 2022		Samantha Kilpatrick	Telephonic	No	Handwritten notes
Complainant, Complainant's Husband	March 31, 2022	Edenton, NC	Samantha Kilpatrick, Russell Holske Jr.	In person	No	Notes
Complainant	April 4, 2022		Samantha Kilpatrick	Telephonic	No	Notes
Complainant, Complainant's Husband	April 5, 2022		Samantha Kilpatrick, Russell Holske Jr.	Telephonic	No	Typed notes
Plaintiff	April 26, 2022	Branson, MO	Samantha Kilpatrick, Russell Holske Jr.	In person	No	Typed notes
██████████	May 4, 2022		Russ Holske Jr.	By video	No	Typed notes
██████████ ██████████	May 5, 2022		Samantha Kilpatrick, Russ Holske Jr.	By video	No	Typed notes
██████████ ██████████	May 5, 2022		Samantha Kilpatrick,	By video	No	Typed notes

			Russ Holske Jr.			
Roy Blankenship	May 9, 2022	Kennesaw, GA	Samantha Kilpatrick, Russell Holske Jr.	In person	No	Typed notes
Complainant	May 10, 2022		Samantha Kilpatrick	Telephonic	No	Typed notes
Plaintiff	May 12, 2022		Samantha Kilpatrick, Russell Holske Jr.	By video	No	Typed notes
Complainant, Complainant's Husband	May 13, 2022		Samantha Kilpatrick, Russell Holske Jr.	Telephonic	No	Typed notes
Complainant	May 19, 2022		Samantha Kilpatrick	Telephonic	No	Handwritten notes
Complainant	May 26, 2022		Samantha Kilpatrick	Telephonic	No	No
Complainant	June 1, 2022		Samantha Kilpatrick	Telephonic	No	Handwritten notes

INTERROGATORY NO. 3. Who was involved in the decision to include the Complainant's allegations against Johnny Hunt in the Report? For each such person, identify that person's relationship to Guidepost; the person's title; and a description of the person's role in making the decision.

Response: Guidepost objects to this interrogatory on the ground that the scope of the Report is set forth in the Engagement Letter. Thus, the burden of responding to this interrogatory outweighs any benefit, because Plaintiff already possesses the information requested.

Notwithstanding the foregoing objection, and without waiver thereof, Guidepost responds that Julie Myers Wood, Krista Tongring, Samantha Kilpatrick, Russell Holske Jr., and Anthony Collura were involved in the decision to include Complainant's allegations against Plaintiff in the Report. Each of the foregoing persons' title is set forth in Guidepost's response to Interrogatory

No. 1, with the exception of Anthony Collura, whose titles are Chief Operating Officer and Chief Legal Officer.

INTERROGATORY NO. 4. Describe the types of documents in Guidepost's possession that relate to the Complainant's allegations against Johnny Hunt. Include in your response whether such documents are in hardcopy or electronic format (including whether such documents include emails, text messages, instant messages such as Slack, video or audio recordings, etc.); the custodian of such documents; and where such documents are stored.

Response: Guidepost responds that the types of documents in Guidepost's possession that relate to the Complainant's allegations against Plaintiff include interview reports and other paper and electronic documents, emails, and other electronic communications. These documents are in electronic format and/or hardcopy and are stored on Guidepost's systems and/or its files.

INTERROGATORY NO. 5. Identify the various methods used by Guidepost agents to communicate regarding the Report and its contents (for example, whether Guidepost agents used email, instant messaging, text messaging, or other electronic means for communicating). For each such method, include the name of the relevant platform (i.e., "Slack" for instant messaging; "Outlook" for email; etc.).

Response: Guidepost responds that the methods used by Guidepost agents to communicate regarding the Report and its contents include email, text messages, other electronic communications, and telephone calls.

INTERROGATORY NO. 6. Does Guidepost use a document management system to store electronic documents? If so, describe the system and where documents relating to the Complainant's allegations against Johnny Hunt are stored within that system, including all drafts of the Report.

Response: Guidepost objects to this interrogatory on the ground that information relating to drafts of the Report containing changes solely to portions unrelated to Plaintiff's claims are irrelevant to Plaintiff's claims. Thus, the burden of responding to this interrogatory with respect to such drafts outweighs any benefit.

Notwithstanding the foregoing objection, and without waiver thereof, Guidepost responds that it primarily uses Microsoft Teams to store electronic documents. Documents relating to Complainant's allegations against Plaintiff are primarily stored within Guidepost's Microsoft Teams system, as well as in attachments to emails and on individual computers.

INTERROGATORY NO. 7. Did Guidepost distribute the final Report to anyone outside of Guidepost? If so, identify all recipients of the Report and the means by which such distribution occurred (e.g., via email, website link, hardcopy by mail, etc.).

Response: Yes. Consistent with the requirements in the Engagement Letter, Guidepost distributed the final Report to the SBC Task Force via email.

Respectfully submitted,

s/ John R. Jacobson
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VERIFICATION

I, Anthony M. Collura, am Chief Operating Officer and Chief Legal Officer at Guidepost, a defendant in the above-entitled action. I have read the interrogatories served upon Guidepost by Plaintiff Johnny M. Hunt and the foregoing Responses and Objections of Defendant Guidepost Solutions LLC to Plaintiff Johnny M. Hunt's First Set of Interrogatories, and know the contents thereof.

I have personal knowledge of the information set forth in the answers to the foregoing interrogatories. I declare under 28 U.S.C. 1746 under penalty of perjury that the foregoing answers to those interrogatories are true according to the best of my knowledge, information, and belief.

Executed on the 17th day of July, 2023.



Anthony M. Collura

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by electronic mail on the following:

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on this 17th day of July, 2023.

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